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Filing date: **03/12/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91204473
Party	Plaintiff Pickin' Cotton Communications, LLC
Correspondence Address	MATT FOGARTY MD PICKIN' COTTON COMMUNICATIONS LLC 232 IVORY STREET LAFAYETTE, LA 70506 UNITED STATES mfogartymd@hotmail.com
Submission	Answer to Counterclaim
Filer's Name	Matt Fogarty, MD
Filer's e-mail	mfogartymd@hotmail.com
Signature	/Matt Fogarty, MD/
Date	03/12/2013
Attachments	Fratty v Frette - Answer to Counterclaim.pdf (6 pages)(22732 bytes)

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ESTTA Tracking number: **ESTTA524326**

Filing date: **03/12/2013**

Proceeding	91204473
Party	Opposer Pickin' Cotton Communications, LLC
Correspondence Address	Pickin' Cotton Communications, LLC 232 Ivory Street Lafayette, LA 70506 United States
Submission	Answer to Affirmative Defense(s) and Counterclaim(s).
Filer's Name	Matt Fogarty, MD
Filer's e-mail	mfogartymd@hotmail.com
Signature	/Matt Fogarty, MD/
Date	03/12/2013
Attachments	Fratty v Frette Answer to Counterclaims.pdf

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

PICKIN' COTTON COMMUNICATIONS LLC,)	
)	
Opposer)	
)	Opposition No.: 91/204473
v.)	Appln. Serial No. 79/103,520
)	Mark: EDMOND FRETTE
EDMUND FRETTE S.A.R.L.,)	
)	
Applicant.)	
)	

ANSWER TO ANSWER TO NOTICE OF OPPOSITION WITH
AFFIRMATIVE DEFENSES

Pickin' Cotton Communications, LLC (“Opposer”), by and through its undersigned representative, Answers the Affirmative Defenses and Counter claims to the Answer to Notice of Opposition with Affirmative Defenses and Counter Claim as follows:

1. For Paragraph 1, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 1, leaving Applicant to strict proof thereof.

ANSWER TO COUNTERCLAIM

Pickin' Cotton Communications, LLC (“Opposer”), by and through its undersigned representative, Answers the Affirmative Defenses and Counter claims in the Answer to Notice of Opposition with Affirmative Defenses and Counterclaim as follows:

1. For Paragraph 1, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 1, leaving Applicant to strict proof thereof.
2. For Paragraph 2, Opposer is without sufficient knowledge to form a belief as to

the allegations of Paragraph 2, leaving Applicant to strict proof thereof.

3. For Paragraph 3, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 3, leaving Applicant to strict proof thereof.

4. For Paragraph 4, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 4, leaving Applicant to strict proof thereof.

5. For Paragraph 5, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 5, leaving Applicant to strict proof thereof.

6. For Paragraph 6, Opposer denies the allegation of Paragraph 6, leaving Applicant to strict proof thereof.

7. For Paragraph 7, Opposer denies the allegations of Paragraph 7, leaving Applicant to strict proof thereof.

8. For Paragraph 8, Opposer denies the allegations of Paragraph 8, leaving Applicant to strict proof thereof.

9. For Paragraph 9, Opposer denies the allegations of Paragraph , leaving Applicant to strict proof thereof.

10. For Paragraph 10, Opposer denies the allegations of Paragraph 10, leaving Applicant to strict proof thereof.

11. For Paragraph 11, Opposer denies the allegations of Paragraph 11, leaving Applicant to strict proof thereof.

12. For Paragraph 12, Opposer is without sufficient knowledge to form a belief as to the allegations of Paragraph 12, leaving Applicant to strict proof thereof.

13. Regarding the closing paragraph Opposer denies that Applicant is entitled to the relief requested therein.

Opposer, Pickin' Cotton Communications, reserves the right to assert other claim(s) or further compulsory or permissive claim(s), if warranted by information obtained through discovery or trial.

WHEREFORE, Pickin' Cotton Communications, LLC., prays for Frette's Affirmative Defense(s) be dismissed and prays that Frette's Counterclaim(s) Petition to Cancel be dismissed; that Edmund Frette S.A.R.L.'s Application Serial No. 79/103,520 be denied.

Pickin' Cotton Communications, LLC has previously appointed Matt Fogarty, MD - ("Esquire2B"), and the following Representatives of the Company of Pickin' Cotton Communications, LLC as its representatives with full powers of substitution and revocation and to transact all business in the United States Patent and Trademark as its representatives in connection with the Notice of Opposition.

Troy Bolden*

Alfonzo "Zo" Bolden*

"T-Roy" Troy Chivers*

NOT Members of the Bar of Virginia (except as indicated)

*NOT Member of ANY Bar including Virginia

Please address all correspondence to **Matt Fogarty, MD** at Pickin' Cotton Communications, LLC, 232 Ivory Street, Lafayette, LA 70506.

The Commissioner is hereby authorized to charge any fee or additional fees which may be required, or credit any overpayment.

Respectfully submitted,

PICKIN' COTTON COMMUNICATIONS, LLC.

By: _____/Opposer/_____ Matt Fogarty, MD
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E:mfogartymd@hotmail.com
Representative for Opposer

Date: March 12, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing ANSWER TO ANSWER TO NOTICE OF OPPOSITION WITH AFFIRMATIVE DEFENSES AND COUNTERCLAIM was served on Applicant at Applicant's correspondence address in the records of the USPTO, this 12th day of March, 2013, by sending same via First Class mail, postage prepaid, to:

Jeffrey H. Kaufmann,
Oblon Spivak Mcclelland Maier & Neustadt Llp
1940 Duke Street
Alexandria, VA 22314

/Matt Fogarty, MD/
Matt Fogarty, MD